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    Attorney for Defendant – EDUARDO WENDLANDT-RAMIREZ
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7
                             UNITED STATES DISTRICT COURT
                                    DISTRICT OF NEVADA
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10
    UNITED STATES OF AMERICA,
                                                   2:23-MJ-00251-EJY
11
                 Plaintiff,
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13
                                                   8<sup>th</sup> Request
    v.
14
    EDUARDO WENDLANDT-RAMIREZ,
15
                 Defendant.
16
17
        STIPULATION AND ORDER TO CONTINUE PRELIMINARY EXAMINATION
18
           IT IS HEREBY STIPULATED AND AGREED by and between OSVALDO E. FUMO,
19
    ESQ., Counsel for Defendant EDUARDO WENDLANDT-RAMIREZ and EDWARD G
20
    VERONDA, Assistant United States Attorney, that Preliminary Examination currently
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    scheduled for May 28, 2024 at 4:00 p.m., be vacated and reset to a date and time convenient to
22
    the court but no earlier than forty-five (45) days.
23
           This Stipulation is entered into for the following reasons:
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25
           1. Counsel has spoken to Defendant and he has no objection to the request for
26
               continuance.
27
           2. Defendant is currently out on pretrial release.
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1	3. Counsel for defendant has spoken to AUSA and he has no objection to the	
2	continuance.	
3	4. Counsel and Government are continuing to explore a pre-indictment plea, ar	
4	continue to have discussions on a pre-indictment resolution.	
5	continue to have discussions on	a pre-maternent resolution.
6	5. Counsel needs additional time	to adequately review the case and/or resolve the
7	matter.	
8	6. Denial of this request for continuance could result in a miscarriage justice.	
9	7. For all the above-stated reasons,	, the ends of justice would best be served by a
10	continuance of the Preliminary Examination until a date and time convenient to the	
12	court.	
13	This is the 8 <sup>th</sup> request for continuance filed herein.	
14		
15	DATED: May 21, 2024	
16		
17	/s/ Osvaldo E. Fumo Esq.	/s/ Edward G. Veronda, Esq.
18	OSVALDO E. FUMO, ESQ.	EDWARD G. VERONDA, ESQ. ASSISTANT UNITED STATES ATTORNEY
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20	ATTORNEY FOR THE DEFENDANT EDUARDO WENDLANDT-RAMIREZ	LAS VEGAS, NEVADA 89101 ATTORNEY FOR UNITED STATES OF
21		AMERICA
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1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 4 UNITED STATES OF AMERICA, 2:23-MJ-00251-EJY 5 6 Plaintiff, 7 8 EDUARDO WENDLANDT-RAMIREZ, 9 Defendant. 10 11 FINDINGS OF FACT 12 Based on the pending Stipulation of counsel, and good cause appearing therefore, the 13 Court finds: 14 This Stipulation is entered into for the following reasons: 15 1. Counsel has spoken to Defendant and he has no objection to the request for 16 continuance. 17 2. Defendant is currently out on pretrial release. 18 19 3. Counsel for defendant has spoken to AUSA and he has no objection to the 20 continuance. 21 4. Counsel and Government are continuing to explore a pre-indictment plea, and 22 continue to have discussions on a pre-indictment resolution 23 5. Counsel needs additional time to adequately review the case and/or resolve the 24 25 matter. 26 6. Denial of this request for continuance could result in a miscarriage justice. 27 7. For all the above-stated reasons, the ends of justice would best be served by a 28

continuance of the Preliminary Examination until a date and time convenient to the court.

This is the 8<sup>th</sup> request for continuance filed herein.

## **CONCLUSIONS OF LAW**

Denial of this request for continuance would deny the parties herein the opportunity to effectively and thoroughly prepare for Preliminary Examination.

Additionally, denial of this request for continuance could result in a miscarriage of justice.

## **ORDER**

IT IS HEREBY ORDERED that the Preliminary Examination currently scheduled for May 28, 2024, at 4:00 p.m., be continued to the 11th day of July, 2024, at 4:00 p.m. in Courtroom 3D.

DATED this 21st day of May , 2024.

U.S. MAGISTRATE JUDGE